

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SENTIUS INTERNATIONAL, LLC,

Plaintiff,

vs.

BLACKBERRY LIMITED and
BLACKBERRY CORPORATION,

Defendants.

Civil Action No. 2:16-cv-773-JRG-RSP

AGREED CLAIM CONSTRUCTION ORDER

On this day came to be considered the parties' Joint Motion for Entry of Agreed Claim Construction Order (Dkt. 86) and the Court, having now reviewed said motion, finds that it should be GRANTED. In view of the parties' agreements on the construction of each of the identified terms, it is hereby

ORDERED that the Court adopts the agreed claim constructions set forth below.

Term	Construction
1. "link" ('633 Patent Claim 17)	a pointer to data or information, or a pointer to the location of data or information
2. "beginning position address" ('633 Patent Claim 17)	beginning point location
3. "display address" ('633 Patent Claim 17)	a position or location on a display
4. "offset value" ('633 Patent Claim 17)	a value from a beginning point

<p>5. " means for recording in a look-up table the starting and ending point addresses"</p> <p>('633 Patent Claim 17)</p>	<p><u>function</u>: recording in a look-up table the starting and ending point addresses</p> <p><u>structure</u>: a computer programmed to record in a look-up table the starting and ending point addresses of the plurality of discrete pieces, and equivalents thereof</p>
<p>6. "means for linking the plurality of discrete pieces to external reference materials by recording in the look-up table, along with the starting and ending point addresses of the plurality of discrete pieces, links to the at least one of the plurality of external reference materials"</p> <p>(' 633 Patent Claim 17)</p>	<p><u>Function</u>: linking the plurality of discrete pieces to external reference materials by recording in the look-up table, along with the starting and ending point addresses of the plurality of discrete pieces, links to the plurality of external reference materials</p> <p><u>Structure</u>: a computer programmed to link the plurality of discrete pieces to external reference materials by recording in the look-up table, along with the starting and ending point addresses of the plurality of discrete pieces, links to the plurality of external reference materials</p>
<p>7. "means for retrieving the selected one of the plurality of external reference materials using a recorded link to the selected one of the plurality of external reference materials"</p> <p>('633 Patent Claim 17)</p>	<p><u>Function</u>: retrieving the selected one of the plurality of external reference materials using a recorded link to the selected one of the plurality of external reference materials</p> <p><u>Structure</u>: a computer programmed to retrieve the selected one of the plurality of external reference materials using a recorded link to the selected one of the plurality of external reference materials, and equivalents thereof</p>
<p>8. "means for selecting a discrete portion of an image of the source material."</p> <p>(‘633 Patent claim 17)</p>	<p><u>Function</u>: selecting a discrete portion of an image of the source material</p> <p><u>Structure</u>: an electronic viewer module of a computer and the pointing device and the electronic display of the computer, and equivalents thereof</p>
<p>9. "means for displaying an image of the textual source material"</p> <p>(‘633 Patent claim 17)</p>	<p><u>Function</u>: displaying an image of the textual source material</p> <p><u>Structure</u>: an electronic viewer module of a computer and the electronic display of the computer, and equivalents thereof</p>

<p>10. “means for comparing the offset value with the starting and ending point addresses recorded in the look-up table to identify one of the plurality of the discrete pieces” (‘633 Patent claim 17)</p>	<p><u>Function</u>: comparing the offset value with the starting and ending point addresses recorded in the look-up table to identify one of the plurality of the discrete pieces <u>Structure</u>: a computer programmed to determine if the offset value falls between the starting and ending point addresses recorded in the look-up table, so that when the offset value falls between the start and end points, one of the plurality of discrete pieces of textual source material is identified, and equivalents thereof</p>
<p>11. “means for displaying on a computer the selected one of the external reference materials” (‘633 Patent claim 17)</p>	<p><u>Function</u>: displaying the retrieved external reference material <u>Structure</u>: an electronic viewer module of a computer and the electronic display of the computer, and equivalents thereof</p>
<p>12. “means for determining a beginning position address of a textual source material stored in an electronic database” (‘633 Patent claim 17)</p>	<p><u>Function</u>: determining a beginning position address of textual source material stored in an electronic database <u>Structure</u>: a computer having a visual editor and grammar parser programmed to assign a character position for the first character of a given set of text within an open text file, and equivalents thereof (‘731 patent at 5:5-19; 7:29-39)</p>
<p>13. “means for cutting the textual source material into a plurality of discrete pieces” (‘633 Patent claim 17)</p>	<p><u>Function</u>: cutting the textual source material into a plurality of discrete pieces <u>Structure</u>: a computer having a visual editor and grammar parser that are utilized to cut the text into individual components of words or phrases, and equivalents thereof (‘731 patent at 5:7-19; 7:1-10)</p>
<p>14. “means for determining a starting point address and an ending point address of at least one of the plurality of discrete pieces based upon the beginning position address” (‘633 Patent claim 17)</p>	<p><u>Function</u>: determining a starting point address and an ending point address of at least one of the plurality of discrete pieces based upon the beginning position address <u>Structure</u>: a computer having a visual editor and grammar parser programmed to identify, for any given words in the file to be linked, their starting and ending character positions offset from the first character position, and equivalents thereof (‘731 patent at 5:5-19; 7:29-39)</p>

15. "means for determining a display address of a selected discrete portion" ('633 Patent Claim 17)	<p><u>Function</u>: determining a display address of the selected discrete portion</p> <p><u>Structure</u>: a computer having a user interface and pointing device to obtain a click position of the pointing device to obtain horizontal and vertical coordinates to establish a position within text, and equivalents thereof ('731 patent at 7:40-45; 6:49-55)</p>
16. "means for converting the display address of the selected discrete portion to an offset value from the beginning position address" ('633 Patent Claim 17)	<p><u>Function</u>: converting the display address of the selected discrete portion to an offset value from the beginning position address</p> <p><u>Structure</u>: a computer having a visual editor and an electronic viewer module programmed to use an index to determine the offset value from the beginning position address of the selected horizontal and vertical coordinates, and equivalents thereof ('731 patent at 6:48-62; 7:29-39)</p>
17. "means for selecting one of the plurality of external reference materials corresponding to the identified one of the plurality of discrete pieces" ('633 Patent Claim 17)	<p><u>Function</u>: selecting one of the plurality of external reference materials corresponding to the identified one of the plurality of discrete pieces</p> <p><u>Structure</u>: a computer having a visual editor programmed to use the offset value to resolve the linking information to identify a corresponding external reference material, and equivalents thereof ('731 patent at 6:46-65)</p>

SIGNED this 22nd day of September, 2017.



ROY S. PAYNE
UNITED STATES MAGISTRATE JUDGE